

KELLEY DRYE & WARREN LLP

James S. Carr (JC 1603)

Mark R. Somerstein (MS 9721)

Keith H. Wofford (KW 2225)

101 Park Avenue

New York, New York 10178

Tel: (212) 808-7800

Fax: (212) 808-7897

Attorneys for BP Products North America Inc., Castrol
Industrial North America, Hoover Precision Products,
Inc., Mercedes-Benz US International, Pension Benefit
Guaranty Corporation, Sojitz Corporation of America,
and Tata America International Corporation

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

)	Chapter 11
In re:)	
)	Case No. 05-44481 (RDD)
)	
DELPHI CORPORATION, <i>et al.</i> ,)	
)	(Jointly Administered)
Debtors.)	

**VERIFIED STATEMENT OF KELLEY DRYE &
WARREN LLP PURSUANT TO RULE 2019 OF THE
FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Kelley Drye & Warren LLP (“KDW”), as counsel to the parties designated herein
in these jointly administered chapter 11 cases, submits this verified statement pursuant to Rule
2019 of the Federal Rules of Bankruptcy Procedure and states as follows:

1. Names and Addresses of the Creditors
Represented by KDW

KDW has been employed to represent the following creditors in these cases:

- (i) BP Products North America Inc. (“BP”), 4101 Winfield Road, Warrenville, IL 60555,
- (ii) Castrol Industrial North America (“Castrol”), 4101 Winfield Road, Warrenville, IL 60555,
- (iii) Hoover Precision Products, Inc. (“Hoover”), P.O. Box 899, Cumming, GA 30028,

(iv) Mercedes-Benz US International (“MBUSA”), 1 Mercedes Drive, Vance, AL 35490,
(v) Pension Benefit Guaranty Corporation (“PBGC”), 1200 K Street, N.W. Washington, D.C.
20005, (vi) Sojitz Corporation of America (“Sojitz”), 1211 Avenue of the Americas, New York,
NY 10036, and (vii) Tata America International Corporation (“Tata”), 101 Park Avenue, New
York, NY 10178.

2. Nature and Amount of the Claims
and Time of Acquisition Thereof

(a) BP provides fuel to Delphi Corporation and its affiliates and subsidiaries
(collectively, the “Debtors”). BP has a general unsecured claim against the Debtors for fuel
delivered in an amount not less than \$50,000.

(b) Castrol provides various types of fluids and lubricants to the Debtors.
Castrol has or may have general unsecured claims, reclamation claims, and/or administrative
priority claims against the Debtors for fuel delivered in an amount not less than \$700,000.

(c) Hoover and the Debtors are parties to two agreements pursuant to which
Hoover provides products to the Debtors. Hoover has or may have general unsecured,
reclamation claims, and/or administrative priority claims against the Debtors for products
delivered in an amount not less than \$1.4 million.

(d) MBUSA is a customer of the Debtors and purchases equipment parts and
products from the Debtors pursuant to various agreements (the “MBUSA Agreements”), the
terms of which are governed by a certain Master Terms and Direct Purchasing Agreement (the
“Master MBUSA Agreement”). MBUSA has or may have claims under the MBUSA
Agreements and the Master MBUSA Agreement, including, without limitation, warranty and/or
indemnification claims.

(e) PBGC is a United States government agency that administers the nation's pension insurance program under Title IV of the Employee Income Security Act of 1974, as amended. PBGC has claims against the Debtors arising out of and in connection with certain defined benefit pension plans maintained by the Debtors.

(f) Sojitz supplies chemical products to the Debtors for use in manufacturing of catalytic products. Sojitz holds (i) a general unsecured claim against the Debtors in an amount not less than \$250,000 for products delivered and (ii) a secured claim in an amount not less than \$50,000 arising from a right of setoff pursuant to section 553 of the Bankruptcy Code.

(g) Tata and the Debtors are parties to various contracts pursuant to which Tata provides information technology outsourcing services to the Debtors. Tata has or may have general unsecured and/or administrative priority claims against the Debtors.

3. Pertinent Facts and Circumstances in
Connection with the Employment of KDW

KDW has fully advised its clients with respect to this concurrent representation. Each of the clients has agreed to such representation and has requested that KDW represent them in these cases.

4. Amount of Claims Owned by KDW

KDW does not hold any claims against or hold any interest in the Debtors.

I, James S. Carr, declare under penalty of perjury that I have read the foregoing
and that it is true and correct to the best of my knowledge, information, and belief.

Dated: New York, New York
October 26, 2005

KELLEY DRYE & WARREN LLP

By: /s/ James S. Carr
James S. Carr (JC 1603)
Mark R. Somerstein (MS 9721)
Keith H. Wofford (KW 2225)
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New York, New York 10178

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